14. (Unchanged) The bridge unit of claim 13 wherein first network protocol is that of a connection-oriented/switched telephony (COST) network, and the second network protocol is that of a data network telephony (DNT) network in which computer-simulated calls may be processed.

15. (Unchanged) The bridge unit of claim 14 wherein the first network is a publicly switched telephony network (PSTN) and the second network is the Internet.

16. (Unchanged) The bridge unit of claim 13 wherein first network protocol is that of a first DNT network, and the second network protocol is that of a second DNT network, wherein the two DNT networks have incompatible data protocols.

17. (Unchanged) The bridge unit of claim 13 wherein first network protocol is that of a first connection-oriented telephony network, and the second network protocol is that of a second connection-oriented telephony network, wherein the two connection-oriented networks have incompatible data protocols.

REMARKS

This response is to the Office Letter mailed in the above-referenced case on July 06 2000. In the Office Letter the Examiner has suggested that Fig. 3 should be designated by a legend "Prior Art". The Examiner objects to the drawings under 37 CFR 1.83(a) stating that the drawings must show every feature of the invention specified in the claims. Therefore the IVR for negotiation, the look-up table for retrieving specific data, and converting

between two like networks such as DNT to DNT must be shown or the features cancelled from the claims. Claims 1-6 and 13-17 are objected to by the Examiner because of informalities. Claims 16 and 17 are rejected under 35 U.S.C. 112, first paragraph. Claims 5-6 are rejected under 35 U.S.C. 112 second paragraph. Claims 1-4, 7-10 and 13-15 are rejected under 35 U.S.C. 102(e) as being anticipated by Williams et al. Hereinafter Williams. Claims 5-6 and 11-12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Williams in view of Iwami et al.

Applicant has carefully studied the rejection, the Examiner's remarks, and the references provided by the Examiner. In response, the Applicant herein amends the appropriate claims to overcome the Examiner's objections and 112 rejections. Applicant herein provides arguments to more particularly point out the subject matter regarded by the inventor as patentable, and to distinguish unarguably over the reference of Williams and Iwami as applied by the Examiner.

Applicant herein provides red-lined drawings to show the IVR and Database/Look-up Table as described in applicant's specification. Regarding the proposed legend for Fig. 3, the applicants described Fig. 3 as art known to the inventors, and not as art in the public domain, and a legend of "Prior Art is therefore not apropriate.

Regarding the 112 rejection of claims 16 and 17, the Examiner states that the specification does not describe in such full, clear, exact and concise terms as to the situation of the networks both being connection-oriented or DNT networks because it is known to any person skilled in the art that the bridge can not function the same way when the protocols are changed that drastically.

Applicant respectfully points out to the Examiner that both claims 16 and 17 are depended from independent claim 13. Claims 13 does not specify connection-oriented or DNT networks, merely networks of different

or incompatible protocols. In applicant's invention, bridges similar to bridge 87 may be provided between any two protocol-incompatible networks. The interface and functionality described is not necessarily limited to connection-oriented networks interfacing with non-connection-oriented networks. Two DNT networks of dissimilar data protocol could be similarly linked, and two connection-oriented networks having incompatible call protocol could also be similarly linked, for example. Applicant's specification clearly teaches elements enabling the linking and conversion of data protocols of DNT and connection oriented protocols.

Applicant believes the elements and functions as recited in claims 16 and 17 are fully within the scope of applicant's claimed invention. Therefore, applicant respectfully request the 112 rejection regarding claims 16 and 17 be withdrawn.

Claim 1, as amended, herein recites:

1. A computerized telephony bridge unit, comprising:

a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network;

a data network port and associated circuitry for receiving and placing Data Network Telephony (DNT) calls on a data network; and

conversion circuitry for converting data representing calls dynamically between DNT and COST telephone calls;

wherein control routines functioning as part of the bridge unit receive a first call from one of the COST and DNT networks, place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls.

The Examiner has rejected claim 1 under 102(e) as being anticipated by Williams. The Examiner states that Williams discloses a bridge unit comprising a trunk line port for receiving and placing COST calls (i.e. 14, 15), a data network port for receiving and placing DNT calls, conversion circuitry (i.e. 15), control routines wherein a first call is dynamically converted and placed on the other network (i.e. col. 5, ll. 15-25).

Applicant teaches and claims a computerized telephony bridge unit. Williams teaches a system and method for placing a conventional telephone call through a RBOC (public telephony switch) to a server 15 in one geographical location, which converts the received telephone call into data packets. The packets are then sent to server 20, which is in a completely separate geographic location, which converts the packets back to analog telephony for forwarding to another telephone. Williams does not accomplish applicant's claimed invention with a single unit as claimed. Williams requires two separate servers in separate geographic locations to accomplish the conversion.

Williams clearly does not disclose a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network, and a data network port and associated circuitry for receiving and placing Data Network Telephony (DNT) calls on a data network. Williams discloses that the servers 15 and 20 receive a call in one protocol and place a call in another; i.e. analog to DNT, or DNT to analog.

Applicant claims an apparatus and method enabling dynamic telephony calls to take place between participants (a caller and a recipient) wherein one of the participants of the call is on a data network and one of the participants of the call is on a COST network. In applicant's invention

the caller and the destination are on two separate networks. Not so in the art of Williams. Williams teaches placing an analog voice call with a conventional telephone, converting the call to DNT, traveling the Internet to another server, converting the call back to analog voice and delivering the call to the destination telephone.

Applicant believes claim 1 is patentable over Williams using the arguments presented above. Claims 2, and 4-6 are patentable on their own merits or at least from a patentable claim.

Regarding dependent claim 3, Williams has absolutely no teaching of a digitally-stored look-up table relating COST telephone numbers to IP addresses, and wherein the control routines are adapted to retrieve specific data from an incoming call, either COST or DNT, and to use the retrieved data to access the look-up table to determine an associated COST telephone number or IP address, and to use the associated COST telephone number or IP address to place a call associated with the incoming call. The Examiner states that Williams discloses retrieving an IP address and accessing a look-up table to place a call (i.e. fig. 6,7). Figure 6 of Williams illustrates "strict source routing" in which the header of a data packet lists all intermediate nodes. Pulling addresses from the header of a data packet is not accessing a look-up table as claimed in applicant's invention.

Figure 7 of Williams illustrates a "Route select table" which is compiled information on routes or nodes retrieved from echo route packets. Echo route packets as disclosed in the system of Williams travel alternate routes to a preset destination, retrieving information about nodes along the way, and returning the information to the table to be used to pick the "best route". Again, applicant argues, this is not utilizing a digitally-stored look-up table relating COST telephone numbers to IP addresses, and wherein the control routines retrieve specific data from an incoming call, either COST or DNT, and to use the retrieved data to access the look-up table to

determine an associated COST telephone number or IP address. Applicant believes claim 3 is patentable on it's own merits as argued.

Claim 7 herein recites:

7. A method for converting telephony calls between Connection Oriented/Switched Telephony (COST) calls and Data Network Telephony (DNT) calls, comprising steps of:

(a) connecting a COST trunk line to a trunk-line port and associated circuitry for receiving and placing Dedicated Connection Telephony (COST) telephone calls on a COST network, the trunk line port and associated circuitry in a computerized telephony bridge unit;

(b) connecting a data network line to a data network port and associated circuitry for receiving and placing Data Network Telephony (DNT) calls on a data network, the data network port and associated circuitry also in the computerized telephony bridge unit;

(c) receiving a first call from one of the COST network and the data network;

(d) placing a second call associated with the first call on the network other than the network on which the first call is received; and

(e) dynamically converting data between the two associated calls, thereby proving a continuing and dynamic telephony connection between a COST telephone connected to the COST network and a DNT terminal connected to the DNT network.

Claim 7 is rejected under 102(e) as being anticipated by Williams. Claim 7 is a method claim corresponding to applicant's claim 1 including the same limitations argued on behalf of claim 1.

Applicant claims a computerized telephony bridge unit having a

trunk line port, capable of receiving and placing COST calls on a COST network, and a data port capable of receiving and placing data network telephony calls on a data network. Converting data representing calls dynamically between DNT and COST telephone calls wherein control routines are adapted to receive a first call from one of the COST and DNT networks, to place a call associated with the received call on the network other than the network on which the call is received, and to dynamically convert data between the associated calls. The dynamic conversion of data enables two people to engage in a live call even though one person is on a data network (Internet) and the other is on a COST network (PSTN).

It is clear to the applicant that the system described in the art of Williams does not connect two separate telephony calls, having separate network protocols, converting data between the calls to enable dynamic communication between the two calls.

Applicant believes claim 7 is patentable over the art of Williams as argued above and on behalf of claim 1 above. Claims 8-12 are also patentable on their own merits, or at least as depended from a patentable claim.

Claim 13 as amended herein recites:

13. A computerized telephony bridge unit, comprising:

a first port and associated circuitry for receiving and placing calls on a first network, including circuitry for generating data according to a protocol compatible with the first network;

a second port and associated circuitry for receiving and placing calls on a second network, including circuitry for generating data according to a protocol compatible with the second network; and

conversion circuitry for converting data dynamically between the

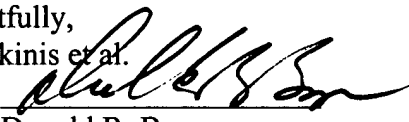*first network protocol and the second network protocol;*

wherein control routines functioning as part of the bridge unit receive a first call from either the first or the second network, place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls.

Claim 13 is rejected by the Examiner using the same reasoning as provided on behalf of claim 1 above. Claim 13 includes the same limitations argued on behalf of claim 1. Therefore, applicant believes claim 13 is also patentable over the reference of Williams. Claims 14-17 are also patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims are patentable to the Applicant over the art of Williams, the Applicant respectfully requests reconsideration and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully,
Dan Kikinis et al.
by _____
Donald R. Boys
Reg. No. 35,074

Donald R. Boys
Central Coast Patent Agency
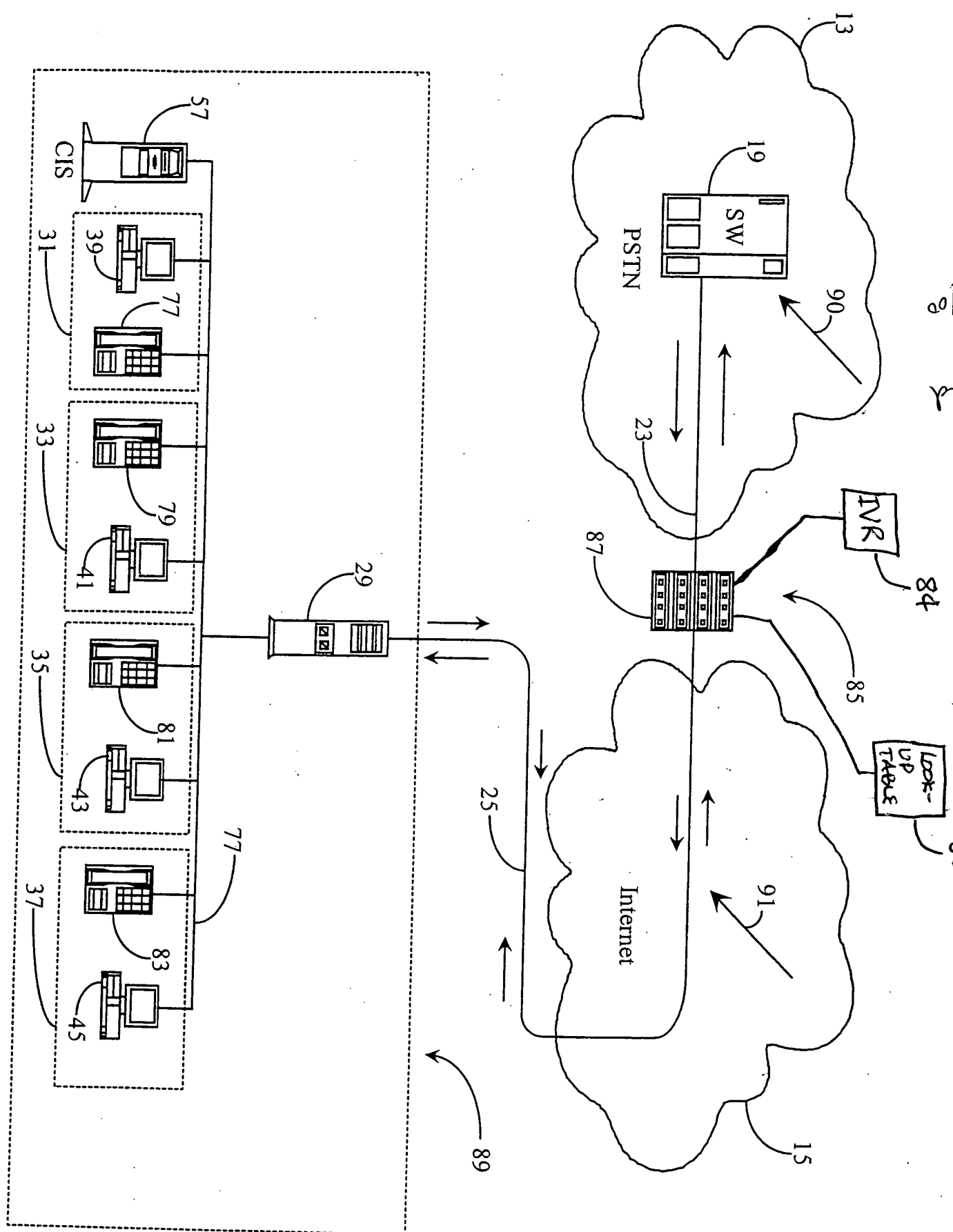P.O. Box 187
Aromas, CA 95004
(831) 726-1457

Fig. 4